

1 Michael Lacovara (209279)
michael.lacovara@freshfields.com
2 FRESHFIELDS BRUCKHAUS DERINGER US LLP
601 Lexington Ave., 31st Floor
3 New York, NY 10022
Telephone: 212 277 4000
4 Facsimile: 212 277 4001

5 Terry Calvani (53260)
terry.calvani@freshfields.com
6 Richard Snyder (*pro hac vice*)
richard.snyder@freshfields.com
7 Christine Laciak (*pro hac vice*)
christine.laciak@freshfields.com

8 FRESHFIELDS BRUCKHAUS DERINGER US LLP
700 13th Street, NW, 10th Floor
9 Washington, DC 20005-3960
Telephone: 202 777 4500
10 Facsimile: 202 777 4555

11 *Counsel for Defendant Beijing Matsushita
Color CRT Co., Ltd.*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

16 | IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION,

Case No. 3:07-cv-5944 SC, MDL No. 1917

18 This document relates to:

19 || ALL INDIRECT-PURCHASER ACTIONS.

20 | Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.,
No. 11-cv-05513;

22 | *Electrograph Sys., Inc., et al. v. Hitachi, Ltd., et al.*, No. 11-cv-01656;

23 *Sears, Roebuck & Co., et al. v. Chunghwa Picture Tubes, Ltd., et al.*, No. 11-cv-05514;

25 *Target Corp. v. Chunghwa Picture Tubes, Ltd.,*
et al., No. 11-cv-05514;

26 *Tech Data Corp., et al. v. Hitachi, Ltd., et al.*,
No. 13-cv-00157;

28
Viewsonic Corp. v. Chunghwa Picture Tubes,
Ltd., et al., No. 14-cv-02510.

**DECLARATION OF RICHARD S.
SNYDER IN SUPPORT OF REQUEST
FOR JUDICIAL NOTICE BY
DEFENDANT BEIJING MATSUSHITA
COLOR CRT CO., LTD. IN SUPPORT
OF MOTION FOR SUMMARY
JUDGMENT FOR FAILURE TO
ADDUCE EVIDENCE SUFFICIENT
TO STATE A CLAIM IN LIGHT OF
THE FTAIA AND FOR LACK OF
STANDING TO SEEK INJUNCTIVE
RELIEF**

[Defendant Beijing Matsushita Color CRT Co., Ltd.'s Motion for Summary Judgment for Failure to Adduce Evidence Sufficient to State a Claim in Light of the FTAIA and For Lack of Standing to Seek Injunctive Relief filed Concurrently Herewith]

Judge: Honorable Samuel Conti
Court: Courtroom 1, 17th Floor
Date: February 6, 2015, 10:00 a.m.

1 I, Richard S. Snyder, do declare and state as follows:

2 1. I am Counsel with the law firm of Freshfields Bruckhaus Deringer US LLP,
3 counsel of record for defendant Beijing Matsushita Color CRT Co., Ltd. (**BMCC**) in these
4 actions.

5 2. I am a member of the Bars of the Commonwealth of Virginia and the District of
6 Columbia and am admitted to practice before this Court *pro hac vice*. I have personal knowledge
7 of the facts stated herein and, if called as a witness, I could and would competently testify thereto.

8 3. Attached hereto as Exhibit X is a true and correct copy of the 2011 Amended Plea
9 Agreement of Samsung SDI Company, Ltd. filed in the United States District Court for the
10 Northern District of California in *United States of America v. Samsung SDI Company, Ltd.*, 11-cr-
11 0162 (WHA).

12 4. Attached hereto as Exhibit Y is a true and correct copy of the February 15, 2006,
13 Order of the Securities and Exchange Commission Instituting Proceedings, Making Findings, and
14 Revoking Registration of Securities Pursuant to Section 12(j) of the Securities Exchange Act of
15 1934.

16 I declare under penalty of perjury under the laws of the United States that the foregoing is
17 true and correct.

18 Executed this 7th day of November, 2014, at Washington, DC.

19 Freshfields Bruckhaus Deringer US LLP

20 By: _____
21

22 Richard S. Snyder (*pro hac vice*)
23 Freshfields Bruckhaus Deringer US LLP
24 Email: richard.snyder@freshfields.com
700 13th Street, NW, 10th Floor
Washington, DC 20005
Telephone: 202 777 4500
Facsimile: 202 777 4555

25 *Counsel to Defendant Beijing Matsushita*
26 *Color CRT Co., Ltd.*

27

FRESHFIELDS
BRUCKHAUS DERINGER
US LLP

ATTORNEYS AT LAW
WASHINGTON, D.C.

28 DECLARATION OF RICHARD S. SNYDER IN SUPPORT
OF BMCC'S REQUEST FOR JUDICIAL NOTICE

Master File 07-cv-5944
MDL 1917